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10 *Attorneys for Defendant Early Warning Services, LLC*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 DALE C. BURNS and RANDALL B. BURNS,

14 Civil No. 2:19-cv-02142-RFB-DJA

15 Plaintiffs,

16 v.
17 EARLY WARNING SERVICES, LLC, and
18 LEXISNEXIS RISK SOLUTIONS, INC.,
19 Defendants.

20 **STIPULATION TO EXTEND TIME
21 TO FILE RESPONSIVE PLEADING
22 (Second Request)**

23 Defendant Early Warning Services, LLC (“EWS”) and Plaintiffs Dale C. Burns and Randall
24 B. Burns, by counsel, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time
25 to File Responsive Pleading up to and including March 13, 2020. In support of the Stipulation, the
parties state the following:

26 1. EWS and Plaintiffs previously stipulated to an extension of time through February
27 28, 2020 for EWS to respond to Plaintiffs’ Complaint.

28 2. Counsel for the parties have been engaged in good faith discussions regarding the
claims asserted against EWS and have undertaken to informally exchange information regarding
those claims.

29 3. This exchange of information may lead to Plaintiffs amending the Complaint.

30 4. To allow the parties to continue these discussions and to give Plaintiffs more time to

1 review information being gathered by EWS, the parties respectfully request that EWS's deadline to
2 respond to the Complaint be extended for a second time.

3 5. Counsel for Plaintiffs has agreed to the requested extension and the requested
4 extension will not impact any other deadlines in this case.

5 6. This is the second request to extend the deadline for EWS to file its responsive
6 pleading.

7 7. Therefore, the parties hereby stipulate that the deadline for EWS to file its
8 responsive pleading shall be extended through March 13, 2020.

9 Dated this 26th day of February, 2020.

10 Respectfully Submitted,

11 By: /s/ Shane Clayton
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23 IT IS SO ORDERED:
24 
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: February 27, 2020
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of February 2020, a copy of the foregoing was filed electronically through the Court's CM/ECF system, which causes service upon all counsel registered thereon.

/s/ Shane Clayton